

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KLEIN TOOLS, INC., a Delaware corporation,

Plaintiff,

V.

JJS CORPORATION, a Korean corporation,
and **JOHN DOES 1-10**, individually or as
corporations/business entities,

Defendants.

Case No. 1:24-cv-02249

Hon. Franklin U. Valderrama

**AGREED MOTION FOR ENTRY OF STIPULATED FINAL JUDGMENT
AND PERMANENT INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 41(a), plaintiff Klein Tools, Inc. (“Plaintiff”) submits this agreed motion for entry of stipulated final judgment and a permanent injunction. In support, Plaintiff states as follows:

1. Plaintiff filed its complaint in this action on March 19, 2024. (Dkt. No. 1.) In the following weeks, Plaintiff communicated with counsel for defendant JJS Corporation (“Defendant”).

2. Plaintiff and Defendant (together with Plaintiff, “the Parties”) have reached an agreement on settlement terms that will resolve this case in full. The Parties’ settlement is conditioned on the Court entering the proposed Stipulated Final Judgment and Permanent Injunction that has been submitted with this motion. Each of the Parties has agreed to the terms in the proposed Stipulated Final Judgment and Permanent Injunction.

3. Accordingly, the Parties hereby request that this Court enter the proposed Stipulated Final Judgment and Permanent Injunction that has been submitted with this Motion and retain jurisdiction over this matter only for the purpose of enforcing and/or adjudicating claims that a party has violated the Stipulated Final Judgment and Permanent Injunction.

4. Through a separate filing, Plaintiff has dismissed Defendants John Does 1-10 from this action without prejudice. Accordingly, entering the proposed Stipulated Final Judgment and Permanent Injunction will resolve all remaining claims and allow for closure of this case.

Dated: April 30, 2024

Respectfully submitted,

/s/ Daniel C.F. Wucherer

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Attorneys for Defendant JJS Corporation

Attorneys for Plaintiff Klein Tools, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed with the Court on April 30, 2024. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Daniel C.F. Wucherer
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